

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

FEB 1 9 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	IB Docket No. 03-38
Philippine Long Distance Telephone Company Globe Telecom, Inc.	}	
AT&T Emergency Petition for Settlement Stop Payment Order and Request for		
Immediate Interim Relief)	
Petition of WorldCom, Inc., for Prevention of)	
"Whipsawing" on the U.SPhilippines)	
Route)	

PHILIPPINE LONG DISTANCE TELEPHONE COMPANY'S EMERGENCY REQUEST FOR EXTENSION OF TIME

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Dated: February 19,2003

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Pursuant to 47 C.F.R. 1.46(c), the Philippine Long Distance Telephone Company ("PLDT") respectfully requests that the Commission grant an extension for PLDT to file its response to the above-captioned petitions of AT&T and WorldCom, Inc. (the "Petitions"), from February 20, 2003 to February 25,2003.

PLDT's counsel first learned of the Petitions on February 10 when they contacted the Commission to discuss a letter from Donald Abelson to the Philippine National Telecommunications Commission, dated January 31, 2003. Although PLDT effectively had only ten days to respond to Petitioners voluminous papers, PLDT fully intended to work through the intervening weekend and public holiday to respond by the February 20 deadline set by the Commission. Given the severe weather conditions in the Washington, D.C. area, however, PLDT's ability to meet this deadline has been substantially compromised for the following reasons.

PLDT's counsel are located in Washington, D.C., and were unable to access their offices on February 16 and 17. Although two of PLDT's attorneys made it to their offices on Tuesday, February 18, the offices were officially closed (as were the offices of the federal government), and support staff was limited. On February 16 and February 17, PLDT's counsel attempted to work from home, but they have had difficulty accessing source materials, conducting research, and generating documents. They have also experienced great difficulty electronically sending and receiving documents

¹ Neither AT&T nor WorldCom served PLDT with copies of the Petitions, and even when notified of their existence by Commission staff, counsel for PLDT could not immediately download them from the Commission's on-line docket.

(particularly between the U.S. and the Philippines). In addition, two of the attorneys assigned to this matter have been stranded outside of Washington this past weekend, and their return flights have been delayed. As of this writing, they have been unable to return

to the area. They have had even less access to materials than the attorneys working from

home.

PLDT's counsel requested that counsel for AT&T and WorldCom agree to permit PLDT to file its response to the Petitions on February 25. Although counsel for AT&T agreed to an extension of one day, to February 21, WorldCom's counsel has

for A1&1 agreed to an extension of one day, to February 21, worldcom's counsel has

not agreed to an extension. Pursuant to 47 C.F.R. 1.46 (c), PLDT's counsel notified

counsel for Petitioners and Commission staff that this motion would be filed.

For all the foregoing reasons, PLDT requests that it be given until

February 25,2003 to respond to the Petitions of AT&T and WorldCom.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned, an employee of Goldberg, Godles, Wiener & Wright, counsel to the Philippine Long Distance Telephone Company, hereby certifies that the foregoing document was sent this 19th day of February, 2003, via first class mail, postage prepaid, and by the additional means shown below, to the following:

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